

1 William D. Marler (WSBA 17233)

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5 *Attorneys for Legal Scholars as Amici Curiae*

6  
7 **UNITED STATES DISTRICT COURT**  
8 **EASTERN DISTRICT OF WASHINGTON**  
9

10 NATIONAL SHOOTING )  
11 SPORTS FOUNDATION, INC., )

12 Plaintiff, )

13 v. )

14 ROBERT W. FERGUSON, )  
15 Attorney General of the State of )  
16 Washington, )

17 Defendant. )  
18 )  
19

NO. 2:23-cv-00113-MKD

MOTION FOR LEAVE  
TO APPEAR PRO HAC VICE  
FOR ALEXANDRA G.  
ELENOWITZ-HESS

06/07/2023

Without Oral Argument

20 I, William Dale Marler, counsel of record for *Amici Curiae* Legal Scholars,  
21 respectfully move the Court for an Order granting admission pro hac vice to  
22 attorney Alexandra G. Elenowitz-Hess to appear in the above-captioned matter as  
23 counsel for *Amici Curiae* Legal Scholars pursuant to Local Rule 83.2(c). I am a  
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1 licensed member in good standing of the State of Washington bar (WSBA No.  
2 17233) and this Court.

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4 Alexandra G. Elenowitz-Hess's qualifications for pro hac admission and  
5 other information required by Local Rule 83.2 (c)(3) are set forth below.

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7 A. Applicant's address and phone number:

8 Alexandra G. Elenowitz-Hess  
9 Friedman Kaplan Seiler Adelman & Robbins LLP  
10 7 Times Square  
11 New York, NY 10036-6516  
(212) 833-1100

12 B. Dates of admission to practice before other courts:

Court	Admission Date
U.S. District Court for the Eastern District of New York	01/10/2019
Supreme Court of New York, Appellate Division, First Department	03/27/2016
U.S. Court of Appeals for the Third Circuit	04/04/2023
U.S. District Court for the District of Columbia	11/04/2019
U.S. District Court for the Southern District of New York	04/19/2016

19  
20 C. Name, address, and phone number of admitted counsel with whom  
21 the applicant is associated.

22 William Dale Marler  
23 **MARLER CLARK, INC., P.S.**  
24 1012 First Avenue, 5th Floor  
25 Seattle, WA 98104  
Tel : 206-346-1888

26 D. The necessity for appearance by the applicant.

1           Given her experience and the focus of her practice, Alexandra G. Elenowitz-  
2 Hess's participation in this action would benefit *Amici Curiae* Legal Scholars and  
3 would assist in ensuring a fair and efficient resolution of this matter. In addition,  
4 Ms. Elenowitz-Hess also represents the Legal Scholars as *amici curiae* in the  
5 appellate proceeding currently pending before the Third Circuit Court of Appeals  
6 (*NSSF v. Matthew Platkin, Attorney General of New Jersey*, No. 22-cv-6646  
7 (D.N.J. filed 2022), on appeal at No. 23-1214 (3d Cir.)).

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10           E.     Whether the applicant has any pending disciplinary sanction actions  
11 or has ever been subject to disciplinary sanctions by any court or bar association.  
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13           Ms. Elenowitz-Hess does not have any pending disciplinary sanctions against  
14 her, nor has she ever been subject to any disciplinary sanctions by any court or bar  
15 admission.  
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1 WHEREFORE, we respectfully request that the Court admit Alexandra G.  
2 Elenowitz-Hess to appear pro hac vice in this action as counsel for *Amici Curiae*  
3 Legal Scholars.  
4

5 DATED this 7th day of June, 2023.  
6

7 **MARLER CLARK, INC., PS**  
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9 By: /s/ William D. Marler  
10 William D. Marler, Esq.  
11 1012 1<sup>st</sup> Avenue, Fifth Floor  
12 Seattle, Washington 98104  
13 Telephone: (206) 346-1888  
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14 **FRIEDMAN KAPLAN SEILER**  
15 **ADELMAN & ROBBINS LLP**

16 Timothy M. Haggerty  
17 (*pro hac vice forthcoming*)  
18 Rupita Chakraborty  
19 (*pro hac vice forthcoming*)  
20 Alexandra Elenowitz Hess  
21 (*pro hac vice forthcoming*)  
7 Times Square  
New York, NY 10036-6516  
(212) 833-1100

22 *Attorneys for Amici Curiae Legal Scholars*  
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**CERTIFICATE OF SERVICE**

On the 7th day of June, 2023, I caused to be served, via ECF electronic service, a true copy of the foregoing Motion for Leave to Appear Pro Hac Vice for Alexandra G. Elenowitz-Hess upon all counsel registered for e-service.

DATED this 7th day of June, 2023

s/ William D. Marler

William D. Marler

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